



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 4, 2021

VIA ECF

The Honorable Andrew L. Carter, Jr.
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

USDC SDNY
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Re: United States v. Recio-Rondon, et al.,
20 Cr. 115 (ALC)

Dear Judge Carter:

The Government writes on behalf of the parties to request an adjournment of the upcoming status conference, currently scheduled for March 5, 2021 at 12 PM, and exclusion of time under the Speedy Trial Act. As the Court is aware, defendant Cristian Valdez's pretrial motion, first filed on August 12, 2020, is fully briefed and pending before this Court, (*see* ECF Nos. 36, 37, 38, 39), as is his bail application, (ECF Nos. 54, 53, 55). Consequently, there are no new issues the Government or defense counsel intend to raise with the Court at the upcoming status conference. In light of the foregoing, all defendants, through counsel, have indicated that they are amenable to an adjournment of the status conference. Likewise, the Government does not oppose an adjournment under these circumstances.

Assuming the conference is rescheduled, the Government respectfully requests that the Court exclude time under the Speedy Trial Act up to the date of the next scheduled conference. 18 U.S.C. § 3161(h)(7). Exclusion of time is warranted given that there are pending motions before the Court, and that additional time will facilitate the contemplation of any pre-trial dispositions. Defense counsel have indicated that they do not object to exclusion of time.

[Continued]

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Wherefore, the Government respectfully requests an adjournment of the parties' upcoming conference and exclusion of time.

Respectfully submitted,

AUDREY STRAUSS
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By: /s/
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cc: All Counsel via ECF

The application is **GRANTED**. The status conference is adjourned to 6/3/21 at 12:30 a.m. Time excluded.
So Ordered.


3/4/21